

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II

DATE: NOV 14 2000

SUBJECT: Requested Expedited Biological Technical Assistance Review  
LE Carpenter/Dayco Site, Lead Investigation Work Plan

FROM: Stephen Cipot, Remedial Project Manager  
Southern New Jersey Remediation Section (ERRD-NJRB-S)

TO: Mindy Pensak, Coordinator  
Biological Technical Assistance Group (DESA-HWSB)

Enclosed for review are four copies of the Work Plan for Delineating and Characterizing Elevated Lead Concentrations in Soil for the LE Carpenter/Dayco Site, located in Wharton Borough, Morris County, New Jersey.

As a note, the April 1994 Record of Decision (ROD) for the site had specified excavation and off-site disposal of soils which contain elevated levels of lead above 600 ppm. However, as the Potentially Responsible Party (PRP) conducted multiple limited phases of site investigations it was discovered that the extent of lead contamination was greater than anticipated. Thereafter, the PRP's and NJDEP have forwarded a case that the lead may be related to historical mining of lead both on-site as well as in the local area, and they have requested that we consider allowing for a change in the remedial action to include an on-site capping remedy. As a further note, in 1997 BTAG previously reviewed and provided comments on a similar work plan for the site, a copy of these comments are attached. While we do not believe that the current work plan adequately addresses BTAG's previously expressed concerns, we ask BTAG to review the current plan so as to update the site file and identify any new issues. Please note, we are also asking for an expedited review.

Thank you, in advance, for your attention to this matter. If you have any questions, comments, or require further information, please contact me at (212) 637-4411.

cc: Carole Petersen, ERRD-NJRB  
Kim O'Connell, ERRD-NJRB-S  
Michael Sivak, ERRD-PSB  
Andy Crossland, ERRD-PSB  
John Cantilli, DEPP-WPB  
Lisa Rosman, NOAA

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II

DATE:

SUBJECT: Biological Technical Assistance Group Review  
LE Carpenter/Dayco Site

FROM: Shari Stevens, Coordinator  
Biological Technical Assistance Group (DESA-HWSB)

TO: Stephen Cipot, Remedial Project Manager  
Southern New Jersey Remediation Section (ERRD-NJRB-S)

As you requested, we are providing the specific information that may be required to evaluate the potential for capping contaminated areas with soil at the LE Carpenter/Dayco Site located in Wharton Borough, Morris County, New Jersey.

The April 1994 Record of Decision (ROD) specified excavation of soils which contain elevated levels of lead. However, during the excavations it was discovered that the extent of contamination was greater than anticipated. Therefore, a change in the remedial action may be proposed.

In order to appropriately evaluate this potential proposal, the extent of lead contamination should be delineated. Reference soil concentrations from the area should also be provided. Since these hot spots areas are within the proximity of the Rockaway River, potential impacts to the River should be assessed. The effects of the river on the cap (i.e. flooding) should also be evaluated. Additionally, including information on the composition of the cap material will assist in the evaluation.

Further assessment of the drainage ditch may be necessary depending on the extent of the lead contamination. Based upon previous data it appears that this ditch may not have been adequately characterized. The elevated concentrations of lead and mercury detected in the sediments may be acting as a potential contaminant source to the Rockaway River.

In order to comply with federal wetlands ARARs, a wetlands assessment and restoration plan would be needed for any wetlands impacted or disturbed by contamination and/or remedial activities. Management practices (Federal Register Volume 51, No. 219, Part 330.6) should be implemented.

If you have any questions, comments, or require further information, please contact Michael Clemetson at (908) 321-6712.

cc: Carole Petersen, ERRD-NJRB  
Kim O'Connell, ERRD-NJRB-S  
Gina Ferreira, ERRD-PSB  
John Cantilli, DEPP-WPB  
Bob Witte, DEPP-SPMMPB

Lisa Rosman, NOAA  
Allen Jackson, USFWS  
Nancy Hamill, NJDEP  
Kate Joyce, NJDEP

bcc: Robert Runyon, DESA-HWSB

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